

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

MUNA AL-SUYID <i>et al.</i> ,	)	
	)	
Plaintiffs	)	
	)	
v.	)	Case No. 1:20-cv-00170 (LMB/JFA)
	)	
KHALIFA HIFTER,	)	
	)	
Defendant.	)	
_____	)	

**JOINT DISCOVERY STATUS REPORT**

Pursuant to this Court's Order of April 22, 2022, Dkt. No. 187, the Parties, having met and conferred, jointly submit the following status report on (1) outstanding discovery issues, and (2) proposed briefing schedule for dispositive motions.

**Outstanding Discovery Issues**

I. Written Discovery

The Parties agree that Defendant will produce supplemental responses to Plaintiffs' Interrogatory No. 13 and Requests for Production, pursuant to the Court's prior orders, by May 4, 2022.

II. Protective Order

The Parties further agree that to facilitate uniform discovery protections across the three related matters, they will negotiate terms for a protective order and will seek uniformity with the expected protective orders in the other two matters.

Toward that end, in the event that the Parties are unable to agree on the terms of a

protective order, the Parties agree to argue a motion for protective order on May 6, 2022, on the same date as protective order motions in the other two matters.

For purposes of producing Confidential and/or Attorneys Eyes Only material, Defendant will specify in the supplemental responses of May 4, 2022 whether any material is being withheld as Confidential and/or Attorneys Eyes Only, and that such material will be produced immediately upon entry of a protective order on May 6, 2022.

### III. Depositions

The Parties agree that the joint deposition of the Defendant will take place on May 9, 2022. Plaintiffs are requesting an additional day of deposition, and this is not agreed by Defendant.

The Parties agree that the re-deposition of Plaintiff Ibrahim al-Krshini, pursuant to the Court's ruling on October 29, 2021, needs to be scheduled and counsel will exchange dates within the next seven days to get that deposition scheduled.

### **Proposed Briefing Schedule**

The following proposed briefing schedule takes into account the parallel dispositive motions to be filed and briefed in the two related matters:

- Dispositive Motion and Brief to be filed July 1, 2022;
- Opposition to be filed July 15, 2022;
- Reply to be filed July 22, 2022;
- Hearing date: July 29, 2022.

WHEREFORE, the Parties request that the Court approve their proposed briefing schedule.

Dated: April 29, 2022

Respectfully submitted,

/s/ Jason C. Greaves

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**CERTIFICATE OF SERVICE**

I certify that on April 29, 2022, a copy of the foregoing was filed with the Clerk of the Court using the Court's CM/ECF system, which will send a copy to all counsel of record.

Dated: April 29, 2022

/s/ Jason C. Greaves

Jason C. Greaves

*Attorney for Khalifa Hifter*